

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Safeland Storage, L.L.C.	AI #:	144688	TEMPO Activity No:	PER20060001
Facility Name:	Angelina Tank Farm	Remarks Submitted by:	Safeland Storage, L.L.C., through its attorney, Boyd Bryan (Jones Walker law firm)		
Permit Writer:	Mark Browning	Permit Writer Email address:	mark.browning@la.gov		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permit Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information *must be submitted*. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – ***DO NOT COMPLETE THIS SECTION.*** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during the public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirement 2.	Specific Requirement 2 requires that “Fuel rate recordkeeping by electronic or hard copy daily. Keep records of the amount of each fuel combusted during each day. Subpart Dc (40 CFR 60.48c(g)(1)” The NSPS regulations under 40 CFR 60.48c(g)(1) states “Except as provided under paragraphs (g)(2) and (g)(3) of this section, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.” Paragraph (g)(2) allows for facilities using natural gas for fuel to “elect to record and maintain records of the amount of each fuel combusted during each calendar month.”	Requirement for 40 CFR 60.48c(g)(2) was added at 40 CFR 60.48c(5)(1) was removed.
Safeland requests that Specific Requirement 2 allow this same recordkeeping option in 40 CFR 68c(g)(2), and therefore requests that Specific Requirement 2 be revised to read as follows: “Fuel rate recordkeeping by electronic or hard copy.		

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	Keep records of the amount of each fuel combusted in accordance with Subpart Dc (40 CFR 60.48c(g)(1)-(3))."	
Specific Requirements 8, 12 & 13.	<p>Specific Requirements 8, 12 & 13 pertain to record keeping requirements for the natural gas fuel use in the facility boilers (EQT0064 – EQT0066). These Specific Requirements require the facility to monitor and record the boiler run time and flow rate each hour. This information can be used to calculate the total flow of fuel each month, to determine estimated actual emissions and heat input. Safeland requests the option to install an automated fuel totalizer to determine the total fuel flow each month.</p> <p>Safeland requests that the third sentence of Specific Requirement 8 be revised to read as follows: "This calculation shall include the amount of natural gas consumed from an automated fuel totalizer, or boiler run times and fuel flow rates to calculate the amount of natural gas consumed."</p> <p>Safeland requests that the first three sentences of Specific Requirement 12 be revised to read as follows: "Combined firing rate heat input monitored by technically sound method. Compliance shall be demonstrated by calculating the total average firing rate on a monthly basis and for the previous twelve month period. This calculation shall include the amount of natural gas consumed measured by an automated fuel totalizer, or boiler run times and fuel flow rates to calculate the amount of natural gas consumed."</p> <p>Safeland requests that the first sentence of Specific Requirement 13 be revised to read as follows: "Combined firing rate heat input recordkeeping as measured by an automated fuel totalizer monthly or the combined firing rate heat input as calculated from boiler run time and fuel flow measurements."</p>	Included
Specific Requirement 107	<p>Specific Requirement 107 limits the amount of time of a roof landing to 24 hrs. Emissions from the landing losses of floating roof tanks are dependant on multiple factors (vapor pressure, molecular weight, time roof is landed, material composition etc.). Specific Requirement 108 requires the facility to record all parameters needed to estimate emissions. Specific Requirement 18 requires the facility to maintain records in order to calculate emissions monthly and compare estimated emissions to the permitted emission rates for all sources included in the TSCAP of which roof landing losses are included.</p>	Included

	<p>Safeland Storage requests that Specific Requirement 107 be deleted from the permit. This would allow the facility the flexibility in roof landing operations (e.g., 1 roof for two days or 2 roofs for 1 day) while Specific Requirements 108 and 18 will ensure that the facility is in compliance with the permitted emission limits. This is required at the facility as the roof landing schedule could be affected by ship/barge arrival schedules which are outside of the facilities control.</p>	
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Emission Rates for TAP/HAP & Other Pollutants	<p>The permit application included emissions for Anthracene which were not included in the permit. Anthracene is a TAP/HAP under the category of Polynuclear Aromatic Hydrocarbon (PAH). Emission of PAHs should be included in the permit at the following rates:</p> <p>GRP 0002 - 0.012 TPY FUG 0001 - < 0.01 TPY EQT 0072 - < 0.01 TPY</p> <p>PAH maximum hourly emissions rates for EQT0001 – EQT0055, EQT0069- EQT0072, FUG0001 and TRT0001 should be included at a rate of < 0.01 lb/hr and EQT0067 should be included at a rate of 0.02 lb/hr.</p> <p>The Facility Total emissions in Section III of the permit should also be updated to include Total PAH Emissions of 0.02 TPY and update the Facility Total TAPs to 8.78 TPY.</p>	Included

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✓	Emission Rates for TAP/HAP & Other Pollutants	The permit application included emissions for the TAP/HAP 2,2,4 Trimethylpentane for Emission Point EQT0069. This limit is not included in the draft permit. Safeland requests the permit include the maximum hourly emission rate of 2.97 lb/hr.	Included
✓	General Information Sheet	The Zip Code listed for the physical location of the facility is listed as 70000. The correct zip code should be 70051.	Included
✓	Inventories	The temperature in the draft permit for the tanks EQT0010 – EQT 0025, EQT 0036– EQT 0043, EQT0047 – EQT0049, EQT0054 – EQT0060 is listed as 70°F. These tanks were included in the application as being heated tanks with a normal operating temperature of 105°F. Safeland requests that the inventory list be revised to be consistent with the permit application. EQT0026 should be listed as 100°F. EQT0064 – EQT0066 should be listed as 425°F. EQT0068 should be listed as 700°F. EQT 0067, EQT0070, and EQT 0071 should be listed as 150°F.	Included
✓	Emission Rates for Criteria Pollutants	The maximum hourly permit limit for VOCs for Emission Point EQT0067 is listed at 404.76 lb/hr. The permit application requested a permit limit of 404.97 lb/hr. Safeland requests that the permit limit be revised to be consistent with the permit application.	Included
✓	Specific Requirements	Specific Requirements 49 – 57 for GRP0001 list requirements for New Source Performance Standards Subpart Db (NSPS Db). GRP0001 is a group source for 3 boilers each under 100 MMBtu/hr. GRP0001 should have requirements listed for NSPS Subpart Dc, not Subpart Db.	Included
✓	Specific Requirements	Specific Requirement 63 for GRP0001 (BCAP-Boiler Cap) states that "Calculated Limit monitored by technically sound method continuously...compliance shall be demonstrated by calculating the VOC, SO ₂ , CO, NO _x and PM emissions each month...calculation shall include boiler run times, flow rate and amount of natural gas consumed". Safeland Storage L.L.C. requests that this condition be clarified to read as follows. "The fuel gas consumption shall be monitored continuously when the	Modify existing

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	<p>boiler is operating and a running total of fuel use calculated. Total fuel use shall be recorded monthly. Compliance shall be demonstrated by calculating the VOC, SO₂, CO, NO_x and PM emissions each month and the total emissions for the 12 consecutive months shall be compared to the annual emission limits in this permit."</p>	
Specific Requirements	<p>CRP0002 Specific Requirements 72, 75, 76, 77, 78, 79 and 81 require the facility to calculate emissions monthly and compare the 12 month consecutive total for each pollutant to the annual emission limit in the permit application. Specific Condition 74 states that "Calculated Limit monitored by calculations continuously" As the Transfer and Storage operations are batch processes, continuous monitoring is not applicable and is inconsistent with conditions 72, 75, 76, 77, 78, 79, and 81. Safeland Storage L.L.C. requests that specific condition 74 be removed from the permit.</p>	Modify
Specific Requirements	<p>CRP0002 Specific Requirement 80 states "the true vapor pressure of all volatile organic liquids stored and loaded at the facility will be monitored. Approved monitoring is the use of a portable analyzer. Any VOLs that have a true vapor pressure ≥ 1.5 shall be routed to the Thermal Oxidizer for destruction. This requirement applies to all transfer and loading equipment in the Barge and Ship Truck Loading (EQT0067), Railcar Loading (EQT0070) and Tank Truck Loading (EQT0071 areas)". Safeland Storage L.L.C. has not been able to identify a portable analyzer capable of monitoring vapor pressure of organic liquids. Safeland Storage, L.L.C. will have a small laboratory on site for analyzing the physical properties of liquids stored and transferred at the facility. Safeland Storage L.L.C. requests that the "portable" requirement be removed from the approved monitoring and the permit allow the flexibility to analyze the VOL for true vapor either at the facility or at an off-site laboratory. Safeland Storage L.L.C. requests that the requirements be clarified to read as follows: "Prior to commencing transfer operations of organic liquids at the Barge and Ship Loading (EQT0071), Railcar Loading (EQT0070), or Tank Truck Loading (EQT0071) areas for which emissions will not be routed to the thermal oxidizer for destruction, the facility shall monitor the VOL prior to loading to determine the true vapor pressure. No VOL with a true vapor pressure greater than or equal to 1.5 psia may be loaded without emissions from the loading operation being controlled by a thermal oxidizer. The VOL shall be monitored for the true vapor pressure after</p>	Modify

	any mixing or blending with any other material has been performed."	
Inventories ✓	No group description is provided for GRP0004 and GRP0005. The descriptions should include: GRP0004 – External Floating Roof Tanks, GRP0005 – Fixed Roof Tanks.	Included
Specific Requirements ✓	Specific Requirement 65 and 66 for GRP0001 (Boiler Cap) require the facility to calculate the combined fire rate heat input each hour and limits the combined heat input to ≤ 195 MMBtu/hr for the three boilers. The maximum hourly +emissions estimates in the permit application are based on each boiler operating at 95 MMBtu per hour or a combined total of 285 MMBtu/hr. The 195 MMBtu/hr listed under the normal operating conditions for the GRP0001 is the annual average firing rate not the maximum. Specific Condition 65 should limit the maximum combined heat input to 285 MMBtu/hr.	Modify
Inventories ✓	The maximum permitted hourly emissions are based on the physical potential to emit for each of the three boilers. The boilers are not physically able to exceed this limit, therefore continuous monitoring is not necessary. Safeland requests that Specific Requirement 66 be removed from the permit.	Modify
Specific Requirements ✓	The maximum operating rate for the loading areas do not reflect the parameters for which the emission estimates are based in the permit application. The maximum operating rate in the draft permit only includes the volume for one loading arm at each area. The maximum operating rates should be changed as follows: EQT0067 – 240,000 BBL/hr (10,080,000 gal/hr), EQT0069 - 2000 bbl/hr (84,000 gal/hr), EQT0070 – 4,000 bbl/hr (168,000 gal/hr).	Modify
Specific Requirements ✓	GRP0004 Specific Requirements 122 and 124 limit the number of times floating roof tanks may be landed to 5. The landing loss emission estimate was based on the landing of 6 floating roof tanks containing highly volatile components per year. Safeland Storage, L.L.C. requests that Specific Requirements 122 and 124 be removed from the permit. Specific Requirement 72 already requires the facility to maintain records, calculate emissions monthly and compare to the permitted emission rates for all sources included in GRP0002. GRP0004 is a subset of GRP0002. This would allow the facility added operational flexibility if the facility must land greater than 6 tank roofs of lower volatile materials without exceeding the facilities permitted emissions.	Modify & work into CAPS

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